

White & Case LLP  
701 Thirteenth Street, NW  
Washington, DC 20005

1 Christopher M. Curran (*pro hac vice*)

2 [ccurran@whitecase.com](mailto:ccurran@whitecase.com)

3 Lucius B. Lau (*pro hac vice*)

4 [alau@whitecase.com](mailto:alau@whitecase.com)

5 Dana E. Foster (*pro hac vice*)

6 [defoster@whitecase.com](mailto:defoster@whitecase.com)

7 White & Case LLP

8 701 Thirteenth Street, N.W.

9 Washington, DC 20005

10 Telephone: (202) 626-3600

11 Facsimile: (202) 639-9355

12 *Counsel to Defendants Toshiba Corporation,*

13 *Toshiba America, Inc., Toshiba America*

14 *Information Systems, Inc., Toshiba America*

15 *Consumer Products, L.L.C., and Toshiba America*

16 *Electronic Components, Inc.*

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 (SAN FRANCISCO DIVISION)

20 IN RE: CATHODE RAY TUBE (CRT)  
21 ANTITRUST LITIGATION

Case No. 07-5944 JST  
MDL No. 1917

22 This Document Relates to:

23 Case No. 13-cv-1173-JST (N.D. Cal.)

24 SHARP ELECTRONICS CORPORATION;  
25 SHARP ELECTRONICS  
26 MANUFACTURING COMPANY OF  
27 AMERICA, INC.,

Plaintiffs,

v.

HITACHI, LTD., *et al.*,

Defendants.

**DECLARATION OF  
LUCIUS B. LAU IN SUPPORT OF  
JOINT MOTION FOR  
ADMINISTRATIVE RELIEF  
SEEKING ISSUANCE OF PRE-  
TRIAL SCHEDULE**

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF JOINT  
MOTION FOR ADMINISTRATIVE RELIEF SEEKING ISSUANCE OF PRE-TRIAL SCHEDULE

Case No. 07-5944-JST  
MDL No. 1917

1 I, Lucius B. Lau, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, counsel for  
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer  
4 Products, LLC, Toshiba America Information Systems, Inc., and Toshiba America Electronic  
5 Components, Inc. (collectively, the "Toshiba Defendants").

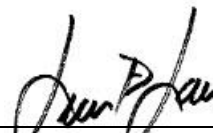
6 2. I submit this declaration in support of the Joint Motion For Administrative  
7 Relief Seeking Issuance of Pre-Trial Schedule (the "Joint Motion"), filed by the parties to the  
8 above captioned action.

9 3. As described in the Joint Motion, the parties in the Sharp action have  
10 consulted in a good faith effort to create a pre-trial schedule for submission to the Court.  
11 After agreeing on many issues, the parties reached an impasse on the parties' pre-trial  
12 exchanges of deposition designations. The parties' conflicting positions are presented in the  
13 Joint Motion.

14 4. To resolve the impasse regarding pre-trial exchanges of deposition  
15 designations, the parties agreed to submit the Joint Motion.

16 I declare under penalty of perjury under the laws of the United States of America that  
17 the foregoing is true and correct.

18  
19  
20 Executed this 31<sup>st</sup> day of August, 2016, in Washington, D.C.

21  
22  
23  
24  
25  
26  
27  
28  
  
\_\_\_\_\_  
Lucius B. Lau

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF JOINT  
MOTION FOR ADMINISTRATIVE RELIEF SEEKING ISSUANCE OF PRE-TRIAL SCHEDULE

Case No. 07-5944-JST

MDL No. 1917